

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DIVISION

FILED (I)

2013 AUG 26 P 1:47

In re:

Chapter 9

Case No. 13-53846

U.S. BANKRUPTCY COURT
E.D. MICHIGAN-DETROIT

CITY OF DETROIT, MICHIGAN

Hon. Steven W. Rhodes

Debtor.

**MOTION TO ALLOW PAPER FILING OF OBJECTIONS TO PETITION FOR
CHAPTER 9 BANKRUPTCY PETITION**

St. Martins Cooperative, a Non-Profit Cooperative (hereinafter "St. Martins"), through her attorneys LAW OFFICES OF LEE & CORRELL, moves to allow paper filing of its objections to the Chapter 9 Bankruptcy Petition filed by Kevyn Orr until training and registration under the local ECF requirements and states as follows:

1. St. Martins Cooperative ("St. Martins") is a Michigan Non-Profit Cooperative, doing business in the City of Detroit, Wayne County, Michigan.
2. Detroit Water and Sewage Department is a non-profit branch of the City of Detroit government, doing business in the City of Detroit, Wayne County, Michigan.
3. Detroit Board of Water Commissioners is a branch of the City of Detroit government, doing business in the City of Detroit, Wayne County, Michigan.
4. St. Martins attempted to file Objections to the Chapter 9 Filing on August 23, 2013.
5. That filing was rejected because Counsel for St. Martins has not yet had the opportunity to obtain registration through ECF.

6. Registration was impossible during the month of August because no classes were held in August. (Exhibit A).

7. The next available training date is September 5, and Counsel for St. Martins is registered for that training. (Exhibit B).

8. Good cause exists to allow for paper filing because this is the only way that St. Martins can file any documents before getting the opportunity to complete the training.

WHEREFORE, St. Martins Cooperative prays that this Honorable Court grant its Motion to Allow Paper Filing of the Objections to the Chapter 9 Petition in this matter. .

LAW OFFICES OF LEE & CORRELL

By: /s/ Michael K. Lee

MICHAEL K. LEE (P40012)

Attorneys for St. Martins Cooperative
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Michael K Lee (44)

Dated: August 26, 2013



UNITED STATES BANKRUPTCY COURT Eastern District of Michigan

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ECF Training Registration

To register for a class, click on the start time of the preferred session.

Detroit
U.S. Bankruptcy Court
211 West Fort Street, 21st Floor
Detroit, Michigan 48228

August 2013

No Classes Scheduled

September 2013

Thu, Sep 05, 2013
09:00 AM - 21st Floor
Creditor Attorney
Seats Available: 10

Tue, Sep 17, 2013
09:00 AM - 21st Floor
Debtor Attorney
Seats Available: 15

Thu, Sep 19, 2013
09:00 AM - 21st Floor
Creditor Attorney
Seats Available: 16

October 2013

Thu, Oct 10, 2013
09:00 AM - 21st Floor
Debtor Attorney
Seats Available: 16

Thu, Oct 17, 2013
09:00 AM - 21st Floor
Creditor Attorney
Seats Available: 16


- Class length is approximately 4 hours.
- Plan to arrive at least 5 minutes prior to the start of the class.
- If participants arrive more than 10 minutes late, they will not be admitted and must reschedule the training.

To Cancel an existing registration please click [here](#)



UNITED STATES BANKRUPTCY COURT
Eastern District of Michigan

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an Attorney](#)[Forms](#)[Case Info](#)[Office of the
US Trustee](#)[Programs &
Services](#)**ECF Training Registration** Please Print for your records

You should receive an email confirmation shortly.

Registration Confirmation for 09:00 AM on Thursday, Sep 05, 2013 in:

Detroit
United States Bankruptcy Court
211 W. Fort St., 21st Floor
Detroit, Michigan 48226

Please refer to ID: 4C2698ED (this is not your ECF ID) for inquiries.

To Cancel Registration please follow the following link: <http://www.mieb.uscourts.gov/apps/ecfTraining/Cancel.cfm?UUID=4C2698ED>